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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

v.

BAMBI GRACE DREAMER,

Defendant.

**MOTION TO REVIEW DETENTION
AND REQUEST FOR HEARING**

Case No. 1:20-CR-066 DS

Magistrate Judge Oberg

Defendant, Bambi Grace Dreamer (“Ms. Dreamer”), by and through her counsel of record, Vanessa M. Ramos, moves this Court to schedule a hearing to review her custody status.

This motion is based on the following:

1. An initial appearance on this indictment was held just yesterday, on January 13, 2021. Based upon Ms. Dreamer’s history of substance abuse as well as her criminal history, she was detained.
2. Ms. Dreamer mentioned to the Court that she had a bed available at the inpatient program, The Haven. Counsel was unaware of that at the time of the hearing, and was unable to provide the Court with confirmation or additional information.

3. Counsel and her investigator have been in contact with Danielle Davidson, the admissions coordinator at The Haven. She has confirmed that Ms. Dreamer has a bed available. *See* attached acceptance letter.

4. Based upon 18 U.S.C. § 3142(f), Ms. Dreamer is entitled to a review hearing, given that this new information was not known or confirmed at the time of her original hearing, and has a material bearing on her conditions of potential release. *See* 18 U.S.C. § 3142(f).

Counsel requests another detention hearing as soon as practicable, to consider release to The Haven.

DATED this 14th day of January, 2021.

/s/ Vanessa M. Ramos

VANESSA M. RAMOS

Assistant Federal Defender